

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**  
Richmond Division

IN RE:	)	
	)	
JENNIFER LEE SMITH	)	Case No. 21-31975-KRH
	)	Chapter 13
Debtor	)	

**AFFIDAVIT OF JENNIFER LEE SMITH IN SUPPORT OF OBJECTION TO CLAIM**

JENNIFER LEE SMITH hereby states as follows:

1. My name is JENNIFER LEE SMITH. I am above the age of 18 years, and competent to make this affidavit.
2. I am the Debtor in the above-captioned case and I have personal knowledge of the facts set forth in this affidavit.
3. I am objecting to Claim Number 7 by First Investors Financial Servicing Corporation for a purported secured debt in the amount of \$21,409.42 ("Claim") on the grounds that the Claim is not secured.
4. The Claim purports to be secured by a 2011 Nissan Maxima-V6 ("Vehicle").
5. The Vehicle was repossessed by First Investors and was subsequently sold at auction in October 2018.
6. One of the exhibits to the Claim is a check from America's Auto Auction Virginia for \$5,880.00 as proceeds from said auction.
7. The Claim is unsecured and should be treated as such in this case.

James E. Kane (VSB #30081)  
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*Counsel for Debtor*

WITNESS the following signature and seal on August 31, 2021.

/s/ JENNIFER LEE SMITH (seal)  
JENNIFER LEE SMITH

State of Virginia  
At Large; to wit:

The foregoing instrument was signed on August 31, 2021 by JENNIFER LEE SMITH.

/s/ Alfred A. Wilson  
Notary Public

My Commission Expires: April 30, 2022  
Notary Registration Number: 7767477